

Eugene P. Ramirez (State Bar No. 134865)
eugene.ramirez@manningkass.com

Kayleigh Andersen (State Bar No. 306442)
kayleigh.andersen@manningkass.com

**MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP**

801 S. Figueroa St, 15th Floor
Los Angeles, California 90017-3012
Telephone: (213) 624-6900
Facsimile: (213) 624-6999

Attorneys for Defendants, COUNTY OF
SAN BERNARDINO and DEPUTY
CHRISTOPHER ALFRED

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

STEFFON BARBER, an individual,

Plaintiff,

v.

COUNTY OF SAN BERNARDINO, a
municipal entity, and DOES 1 through
10, inclusive,

Defendant.

Case No. 5:22-cv-00625-KK-DTBx

*[District Judge, Kenly Kiya Kato,
Magistrate Judge, David T. Bristow]*

**DEFENDANTS' PROPOSED
STATEMENT OF THE CASE**

Trial Date: 1/26/26

TO THE HONORABLE COURT AND TO ALL PARTIES AND COUNSEL:

By and through their counsel of record in this action, defendants COUNTY OF SAN BERNARDINO and DEPUTY CHRISTOPHER ALFRED (collectively herein after as “Defendants”) – hereby submit the following [Proposed] Joint Statement of the Case to be provided to the jury panel at the time of trial, pursuant to Federal Rules of Civil Procedure 16 and 51; United States District Court, Central District of California Local Rules 16-2, 16-3, 16-4, 16-5, 16-6, 16-7, 16-8, 51-1, 51-2, 51-3 and 51-4; and the Orders of the Court (as applicable).

The signatory party reserves the **right to amend** this Proposed Statement of the Case, subject to any objections, motions *in limine*, and pertinent Orders of the Court.

1 DATED: December 22, 2025

Respectfully submitted,

2 **MANNING & KASS**
3 **ELLROD, RAMIREZ, TRESTER LLP**

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5 By: /s/ Kayleigh Andersen

6 Eugene R. Ramirez

7 Kayleigh A. Andersen

8 Attorneys for Defendants, COUNTY OF
9 SAN BERNARDINO and DEPUTY
10 CHRISTOPHER ALFRED

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JOINT STATEMENT OF THE CASE

This civil lawsuit arises out of an incident that occurred on April 27, 2021 in Adelanto, California between Defendant San Bernardino Sheriff's Department Deputy Christopher Alfred and Plaintiff Steffon Barber. On that date, Deputy Alfred responded to a call for service at Mr. Barber's residence, and a deputy-involved shooting occurred. Mr. Barber contends that Deputy Alfred used excessive and unreasonable deadly force, was negligent in his conduct with Mr. Barber, and acted with reckless disregard for Mr. Barber's constitutional right to be free from excessive force. Plaintiff seeks damages to the extent permitted by law.

Defendants County of San Bernardino and Deputy Alfred contend that Mr. Barber posed an immediate threat to Deputy Alfred when he reversed his vehicle in Deputy Alfred's direction. Defendants contend that Deputy Alfred used only objectively reasonable force under the totality of the circumstances. Defendants deny the nature and extent of Plaintiff's claimed damages.